

EXHIBIT B

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
BOIES SCHILLER FLEXNER LLP
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsfllp.com
 brichardson@bsfllp.com

Jesse Panuccio (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 1401 New York Ave, NW
 Washington, DC 20005
 Tel.: (202) 237-2727
 Fax: (202) 237-6131
 jpanuccio@bsfllp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100
 Fax: (310) 789-3150
 abonnn@susmangodfrey.com

Attorneys for Plaintiffs

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander P. Frawley
 (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas,
 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 ssh Shepard@susmangodfrey.com
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
 Michael F. Ram (admitted *pro hac vice*)
 Ra O. Amen (admitted *pro hac vice*)
MORGAN & MORGAN
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 rmcgee@forthepeople.com
 mram@forthepeople.com
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' REQUEST TO DISCLOSE
 PROTECTED MATERIALS TO
 CERTAIN EXPERT CONSULTANTS**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' Joint Letter Brief regarding Plaintiffs' request to disclose materials marked "Confidential" or "Highly Confidential" to the following individuals, who are expert consultants employed by Concur IP Consulting Pvt. Ltd:

- Ashish Kapoor
- Ayush Bansal
- Kanika Arora
- Kriti Negi
- Manuj Kumar
- Raj Makwana
- Sanjay Nama
- Sanjeev Baghoriya
- Sonam Jain
- Vinod Kumar
- Sachin Kumar Sinha

Google has failed to show that the risk of harm that disclosure to these individuals would entail outweighs Plaintiffs' need to disclose the Protected Material to the experts of its choosing, as required by the protective order. *See* ECF No. 70, ¶ 7(d). Google's objection is therefore **OVERRULED**, and Plaintiffs' request is **GRANTED**.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge